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August 15, 2018

By ECF only

Honorable Paul A. Engelmayer  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 2201  
New York, New York 10007  
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Re: *Cintron v. Trump Org. LLC, et al.*, 1:18-cv-06921 (S.D.N.Y.) (PAE):  
(1) Request for Extension of Time To Oppose And Reply On Motion;  
and (2) Request to Adjourn The Initial Pretrial Conference

Dear Judge Engelmayer:

We represent the plaintiff Noel Cintron ("Cintron") in the above-referenced action and write pursuant to this Court's Individual Rule 1(E) to request an extension of time regarding defendants' Trump Organization LLC's and Trump Tower Commercial LLC's (collectively, the "Defendants") motion to compel arbitration (the "Motion"), filed on August 8, 2018 (Docket #9). Pursuant to Local Rule 6.1(b), Cintron's opposition to the Motion is due on August 22, 2018, and Defendants' reply is due on August 29, 2018. I am the primary draftsman of Cintron's opposition papers, and I am scheduled to be on a much-anticipated family vacation the week of August 22, when Cintron's opposition papers are due. As such, I requested an extension of time, to which counsel for Defendants graciously consented.

The briefing schedule the parties agreed on is that Cintron's opposition papers to the Motion will be due on or before August 31, 2018 and Defendants' reply papers in further support of the Motion will be due on or before September 12, 2018. There have been no prior requests for adjournments or extensions of time. This extension will not affect any other dates since no Civil Case Management Plan and Scheduling Order has yet been entered.

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Separately, this Court scheduled an initial pretrial conference in this matter for September 6, 2018 at 11:30 am. While the parties are available to appear in Court on that date and time, the parties agreed to request that that conference be adjourned to a time after the Motion is decided. If the Motion is granted, this litigation will be dismissed or stayed and will instead proceed in arbitration. If the Motion is denied, the parties and the Court can schedule an initial pretrial conference at that time. Counsel for Defendant joins in this request as well.

I thank the Court for its consideration.

Respectfully submitted,

/s/ *Joshua Krakowsky*

Joshua S. Krakowsky

cc: Howard Wexler, Esq. (counsel for Defendants)